

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CAROLYN CLARK, *et al.*,
*individually and on behalf of a class of
similarly situated persons,*

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendant.

Civil Action No.: 3:16-CV-32-MHL

**JOINT CONSENT MOTION FOR ENTRY OF
AGREED SCHEDULING ORDER**

Defendant, Experian Information Solutions, Inc. (“Experian”), and Plaintiffs Carolyn Clark, *et al.*, and those individuals similarly situated (collectively, “Plaintiffs”), by counsel, pursuant to Federal Rule of Civil Procedure 16(b), respectfully request that the Court enter an agreed scheduling order bifurcating class and merits discovery and setting deadlines for Plaintiffs’ class certification motion and class discovery. On May 2, 2017, Experian withdrew its Motion for Partial Summary Judgment on the Issue of Willfulness, without prejudice. (Dkt. Nos. 47, 48). The Parties now seek to coordinate discovery across similar public record class actions brought by these Plaintiffs’ counsel, including *Frances Brown, et al. v. Experian Information Solutions, Inc.*, Case No. 3:16-cv-670 (E.D. Va.) and *Korin Taylor v. Experian Information Solutions, Inc.*, Case No. 1:16-cv-02074 (D. Md.), and similar discovery deadlines for these cases would allow for better coordination. Specifically, the Parties request additional time to collect and produce certain documents requested in discovery, including data regarding potential class members, which Experian has agreed to produce pursuant to the entry of an agreed order filed separately with the Court.

The Parties move the Court to adopt the following schedule:

1. Class discovery shall be completed on or before August 31, 2017.
2. The Parties shall file their motion for class certification on or before September 21, 2017. Briefs in opposition must be submitted within 30 days following such motion, with reply briefs due 14 days thereafter.
3. Following the Court's ruling on class certification, merits discovery shall commence.
4. Dispositive motions shall be filed no later than ninety (90) days following the Court's ruling on class certification. Briefs in opposition shall be submitted thirty (30) days thereafter. Reply briefs shall be submitted fifteen (15) days thereafter.

The Parties have attached hereto a proposed agreed order for the Court's consideration and entry.

Dated: May 18, 2017

Respectfully submitted,

/s/ Leonard A. Bennett

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CERTIFICATE OF SERVICE

A copy of the foregoing was filed on this 18th day of May, 2017 with the Court via the CM/ECF system, causing it to be served on all CM/ECF users.

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